

IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Geneva Reed-Veal, Individually	)	
& as Mother and Personal	)	
Representative of the Estate of	)	
Sandra Bland, deceased.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	No. 4:15-cv-02232
	)	Judge David Hittner
Brian Encinia, Et al.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' ADDITIONAL AND SUPPLEMENTAL DISCLOSURE**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Plaintiffs Geneva Reed-Veal, Individually and as Mother and Personal Representative of the Estate of Sandra Bland, deceased, hereby submits their Initial Disclosure, as follows:

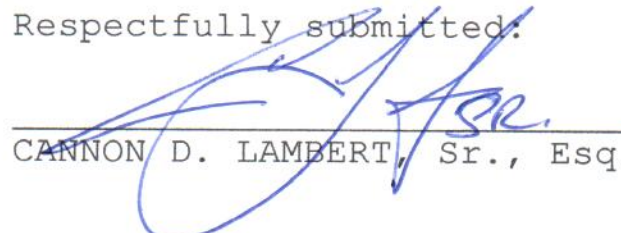
- i) The name and, if know, the address and telephone number of each individual likely to have discoverable information-along with the subject of that information-that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

**RESPONSE:**

- 1) Jesus Lewis - filmed the bystander video.
- 2) Crag Davis - Past Jail Administrator who authored and issued a June 25, 2010 policy memo governing depressed inmates.
- 3) Officer, Michael Kelly - Prairie View police officer.

· This initial and preliminary disclosure will be amended upon Plaintiff obtaining additional information not yet in per possession. Plaintiff therefore, retain the right to supplement and/or amend this disclosure when and where doing so is appropriate.

Respectfully submitted:



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